



CARES Act Funding

Questions & Answers
Webinar



CARES Act Webinar

Please note this session is provided for information purposes only. GMA is not authorized to make final determinations about funding request eligibility, but we are here today to provide you with information based on our discussions with state officials, our familiarity with CARES Act legislation and Treasury guidance. City officials are urged to contact Corinne Thornton at DCA at Corinne.Thornton@dca.ga.gov or Anna Miller at OPB at anna.miller@opb.georgia.gov for clarification you need on a particular item or issue. This session is not and should not be treated as legal advice. You should consult with your legal counsel if you have any questions of a legal nature related to the CARES Act legislation.



Session Agenda

- Cares Act Website Portal
- Creating Pay Request for Reimbursement
- Q&A/Guidance
- Accounting of CARES Funds
- Q&A
- Resources Available
- Wrap-up

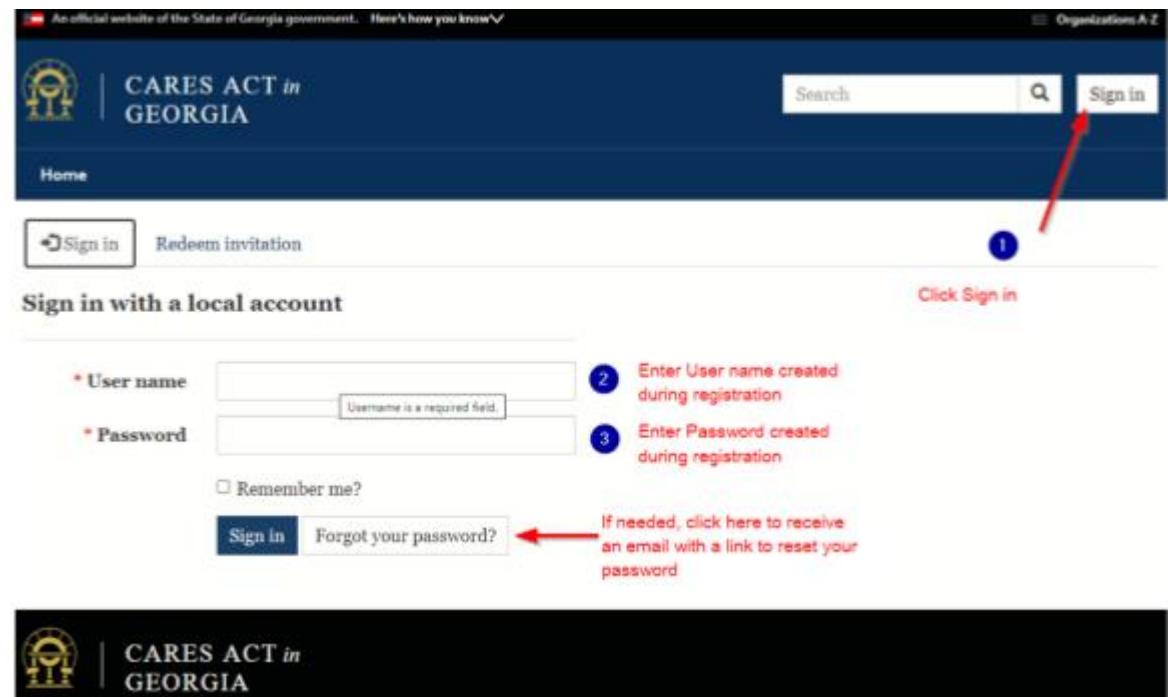


Portal Guide

CARES Portal: Basic Information

STEPS TO SIGN IN AFTER REDEEMING YOUR INVITATION

1. Open a new web browser session. The portal is accessible from personal computers and mobile devices.
2. Type CARES.georgia.gov in the address bar.
3. Click Sign In
4. Enter the email address or user name created when you redeemed your invitation.
5. Enter your password and click Sign In



An official website of the State of Georgia government. [Here's how you know](#) ▾

Organizations A-Z

CARES ACT in GEORGIA

Home

Search Sign in

Sign in Redeem invitation Click Sign in

Sign in with a local account

* User name Username is a required field.

* Password

Remember me?

Sign in Forgot your password?

If needed, click here to receive an email with a link to reset your password

CARES ACT in GEORGIA



CARES Portal: Basic Information

A screenshot of the "CARES ACT in GEORGIA" website. The header features a circular logo on the left, followed by the text "CARES ACT in GEORGIA". To the right is a search bar with a magnifying glass icon and a user profile icon. Below the header is a dark blue navigation bar with links for "Home", "Payment Requests", "Help", and "Contact Us".

Home Payment Requests Help Contact Us

My Grants

The Governor's Office of Planning and Budget (OPB) is responsible for disbursement and oversight of the Coronavirus Relief Fund (CRF). Allocations to local governments were determined on a per-capita basis. These allocations will be available to local governments in two ways: advance and reimbursement.

Advance Payments: Local governments will receive 30% of their allocation upon agreement to the terms and conditions. Following receipt of advance funds, local governments will be required to return to this portal to upload supporting documentation immediately after those funds have been spent. Funds can only be spent on eligible COVID-19 related expenses. Local governments are required to return funds that are not supported by documentary evidence to confirm they are properly spent.

Reimbursement Payments: Following documentation of allowable expenses for the initial 30% advance allocation, local governments can request reimbursement for eligible COVID-19 related expenses against the remaining 70% portion of their per capita allocation. To receive these funds, local governments must submit a payment request along with supporting documentation. The next step is to create projects, expenses, and submit payment requests.

ID ↑	Grant	Status	Amount Awarded	Amount Approved	Amount Drawn
CRF Local Entity Round 1	CRF-2020 Local Entity Round 1	Approved	\$249,400.08	\$0.00	\$0.00



CARES Portal: Adding A Project

A screenshot of the CARES ACT in Georgia portal. The header features a logo of three lit lightbulbs, the text "CARES ACT in GEORGIA", a search bar, and a user icon. Below the header are navigation links: Home, Payment Requests, Help, and Contact Us.

Grant -CRF Local Entity Round 1

Grant	-CRF Local Entity
Type	Round 1
Amount Awarded	Advance Payment
Amount Approved	\$249,400.08
Amount Requested	\$0.00
Amount Drawn	\$0.00

Details

ID *	Grant *	Status
CRF Local Entity Round 1	CRF-2020 Local Entity Round 1	Approved
Grantee *	Primary Contact *	Grant Amount
Dublin city	Phil Best	\$249,400.08

Projects

New Project

Project ID ↑	Project Name	Project Description	Status	Created On	
PR-0000314	Public Safety Payroll Expenditures	Public Safety payroll costs associated with COVID-19.	Active	8/12/2020 3:25 PM	View

CARES Portal: Adding A Project



A screenshot of the website's header. It features a logo of two stylized lightbulbs, the text "CARES ACT in GEORGIA", a search bar with a magnifying glass icon, and a user profile icon.

Home > Grant > Project

Project

-CRF Local Entity Round 1

Grant	CRF Local Entity
Type	Round 1
Amount Awarded	Advance Payment
Amount Approved	\$249,400.08
Amount Requested	\$0.00
Amount Drawn	\$0.00

Project ID

—

Project Name *

Project Start Date *

Project End Date

Project Location

Street *

City *

County

CARES Portal: Adding A Project



Screenshot of the CARES ACT in GEORGIA portal showing the project addition form.

Header:

- Logo: Georgia State Seal
- Text: CARES ACT in GEORGIA
- Search bar: Search icon, User icon

Navigation:

- Home
- Payment Requests
- Help
- Contact Us

Project Description *

Public Safety payroll costs associated with COVID-19.

Project Justification

Public safety response substantially dedicated to COVID-19 mitigation.

Planned Project Outcome

Pandemic response assistance for city and addressing emergency orders.

Add Project



Project Public Safety Payroll Expenditures

Type	Round 1
Amount Awarded	\$249,400.08
Amount Approved	\$0.00
Amount Requested	\$0.00
Amount Drawn	\$0.00

Project ID

PR-0000314

Project Name *

Public Safety Payroll Expenditures

Status

Active

Project Start Date *

3/1/2020

Project End Date

5/1/2020

Project Location

Street

100 S. Church Street

City

Dublin

County

—

State

GA

ZIP Code

31021

Project Description *

Public Safety payroll costs associated with COVID-19.



Projects

Click on the link to the
project under which
payment request will be
made

Create

Project Name	Project Description	Status	Created On	
Girls and Boys Club Activities	Renovated to serve as a supply storage and triage facility.	Active	5/29/2020 6:07 AM	View details
Food Delivery to Elderly homes	Purchased equipment and prepared meals.	Active	5/28/2020 6:21 PM	View details
Expanded warehouse for storage of supplies on Northside	Construction of annex building to store supplies.	Active	5/27/2020 1:32 PM	View details



Payment Requests



[New Payment Request](#)

Payment ID ↑	Amount Requested	Payment Date	Payment Status	Submitted On	Amount Approved
--------------	------------------	--------------	----------------	--------------	-----------------

There are no records to display.



Payment Request PA-0001007

Type	Round 1 Advance Payment
Amount Awarded	\$249,400.08
Amount Approved	\$0.00
Amount Requested	\$0.00
Amount Drawn	\$0.00
Project Start Date	3/1/2020
Project End Date	5/1/2020

The expenditures reported below were necessary and incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19). Use the 'New Direct Expense' button to add expenses and upload supporting documentation.

Payment ID

PA-0001007

Payment Status

Amount Requested

\$0.00

Amount Approved

\$0.00

Direct Expenses

[New Direct Expense](#)

Expense ID ↑	Category	Description	Total Expenses	Expense Status
--------------	----------	-------------	----------------	----------------

There are no records to display.



Direct Expense DEXP-0001537

Type	Round 1 Advance Payment
Amount Awarded	\$249,400.08
Amount Approved	\$0.00
Amount Requested	\$0.00
Amount Drawn	\$0.00
Project Start Date	3/1/2020
Project End Date	5/1/2020

Expense ID

DEXP-0001537

Expense Status

Draft

Expense Paid Date *

Category *

Allowable Activity *

Description *



Lookup records

Search



Name ↑

Economic Support

FEMA Match

Medical

Nursing Home Assistance



Payroll Expenditures

Public Health

Other

Select

Cancel

Remove value

Category
Drop
Down Box



Direct Expense DEXP-0001537

Type	Round 1 Advance Payment
Amount Awarded	\$249,400.08
Amount Approved	\$0.00
Amount Requested	\$0.00
Amount Drawn	\$0.00
Project Start Date	3/1/2020
Project End Date	5/1/2020

Expense ID

DEXP-0001537

Expense Status

Draft

Expense Paid Date *

5/1/2020



Category *

Payroll Expenditures



Description *

Payroll associated with public safety during COVID-19 response

Allowable Activity *

Payroll expenses for public safety employees





Lookup records



Search

✓ Name ↑

✓ Payroll expenses for human services employees

Payroll expenses for public health/health care employees

Payroll expenses for public safety employees

Payroll for a Substantially Different Use

Workers' Compensation

Allowable
Activity
Drop
Down Box

Select

Cancel

Remove value



Expense ID

DEXP-0001537

Expense Status

Draft

Expense Paid Date *

5/1/2020



Category *

Payroll Expenditures



Allowable Activity *

Payroll expenses for public safety employees



{ Description * }

Payroll associated with public safety during COVID-19 response



Direct Expense Girls and Boys Club Activities

Expense Paid Date *

5/29/2020

Category *

Public Health

Allowable Activity *

Distance learning, including technological improve

Description

Added computer lab for students to study together while practicing social distancing.

Quantity *

1

Unit *

Each

Cost/Unit *

\$ 25,000.00

Total Expenses

\$25,000.00

Each
Hour
Daily
SF

Supporting Documentation

Expense Type 1

Please upload your expenses

Expense Type 2

Section displays after adding the Direct Expense. Use this section to upload supporting documentation.

Supporting Documentation

Contracts

Use this document type to upload contract-related documentation; e.g. change orders, signed contracts and scope of work.

Equipment

Use this document type to upload equipment-related documentation; e.g. equipment rates, proof of purchase, and salvage value.

General items

Use this document type to upload general-related documentation; e.g. , insurance, environmental concerns, and historic preservation compliance.

Labor

Use this document type to upload labor-related documentation; e.g. timesheets, pay rates, and daily logs.

Materials & Supplies

Clicking on each arrow opens up for you to select file on computer



Save Direct Expense

Payment Request Girls and Boys Club Activities

The expenditures reported below were necessary and incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19). Use the 'Create' button to add expenses and upload supporting documentation.

Payment ID

PA-000699

Amount Requested

\$25,000.00

Amount Approved

\$0.00

Direct Expenses

Create additional
expenses or
submit for payment

1

Create

Expense ID ↑

Category

Description

Total Expenses

Expense Status

DEXP-0000336

Public Health

Added computer lab
for students to study
together while
practicing social
distancing.

\$25,000.00

Draft

 Edit

2 Click Submit For Payment

Submit For Payment | Save

Payment Requests

Create

Payment ID ↑

Amount
Requested

Payment
Date

Payment
Status

Submitted On

Amount
Approved

PA-000699

\$25,000.00

Submitted

5/29/2020

\$0.00

 View details





Supporting Documentation

Invoice minimum requirements:

- Original invoice
 - Not billing summary statement
- Dates after March 1st
- Vendor/Company details
- Itemization of items/services, such as:
 - Quantity
 - Detailed description
 - Unit price
 - Invoice totals
- Appropriate approval that purchase was authorized

Supporting Documentation

Payroll minimum requirements:

- Dates after March 1st
- Division/Department details
- Employee details, such as:
 - Department • Employee title • Hours • Hourly Rate • Calculations of gross/net pay amounts
- Appropriate approval that payroll was authorized



Personnel Questions & Answers



Is Public Safety's “Regular” Payroll a Reimbursable Expense?

✓ YES

- Per guidance from U.S. Treasury, Public Safety employees are presumed to be substantially dedicated to COVID-19 mitigation. Excepting administrative costs. Treasury assumed your locality did not budget for public safety officers to be used for pandemic response.
- Treasury guidance allows state and local governments to presume that 100% of public safety payroll costs are dedicated to COVID-19 response during the eligible spending period to streamline the administrative burden of accounting for expenses.



Are Benefits for Public Safety Reimbursable Under CARES?

- ✓ YES-Payroll and benefit costs associated with public employees to include public safety, public health, health care, human services, and similar employees.
- ✓ ALL Payroll & Benefits are reimbursable from March 1st thru September 1st under Phase I CARES funding.

What is Classified as Public Safety?

Police

Fire

EMS

EMA

Rescue



Does the Chief of Police & the Deputy Chief of Police count as “administrative” staff or are their salaries reimbursable since they are sworn officers?

This depends on the duties that they perform. If they perform patrol functions and other public safety functions, then yes. If their role is strictly managerial or administrative, then no.

Is the signed
timesheet adequate
documentation for public
safety payroll?

Payroll minimum requirements:

Dates after March 1st

Division/Department details

Employee details, such as:

- Department
- Employee title
- Hours
- Hourly Rate
- Calculations of gross/net pay amounts
- Appropriate approval that payroll was authorized

NAME OF EMPLOYEE		FOR WEEK ENDING						
DEPARTMENT		EXCEPTIONS						
DAY OF WEEK	MORNING		AFTERNOON		OVERTIME		FOR OFFICIAL USE ONLY	
	IN	OUT	IN	OUT	IN	OUT	REGULAR HOURS	OVERTIME HOURS
MONDAY								
TUESDAY								
WEDNESDAY								
THURSDAY								
FRIDAY								
SATURDAY								
SUNDAY								
TOTAL HOURS								

NO PERSON IS PERMITTED TO WORK OVERTIME WITHOUT SPECIAL AUTHORIZATION.
THIS TIME SHEET MUST BE PERSONALLY FILLED OUT AND SIGNED BY EMPLOYEE.

AUTHORIZATION OF OVERTIME _____ EMPLOYEE SIGNATURE _____

www.AffirmTime.com

Would the Electric department,
Water/Sewer, Sanitation & Public Works
departments be considered essential
employees and eligible for salary
reimbursement under CARES?

Not necessarily. Only if the local
government can demonstrate that
the duties were substantially
different due to COVID.



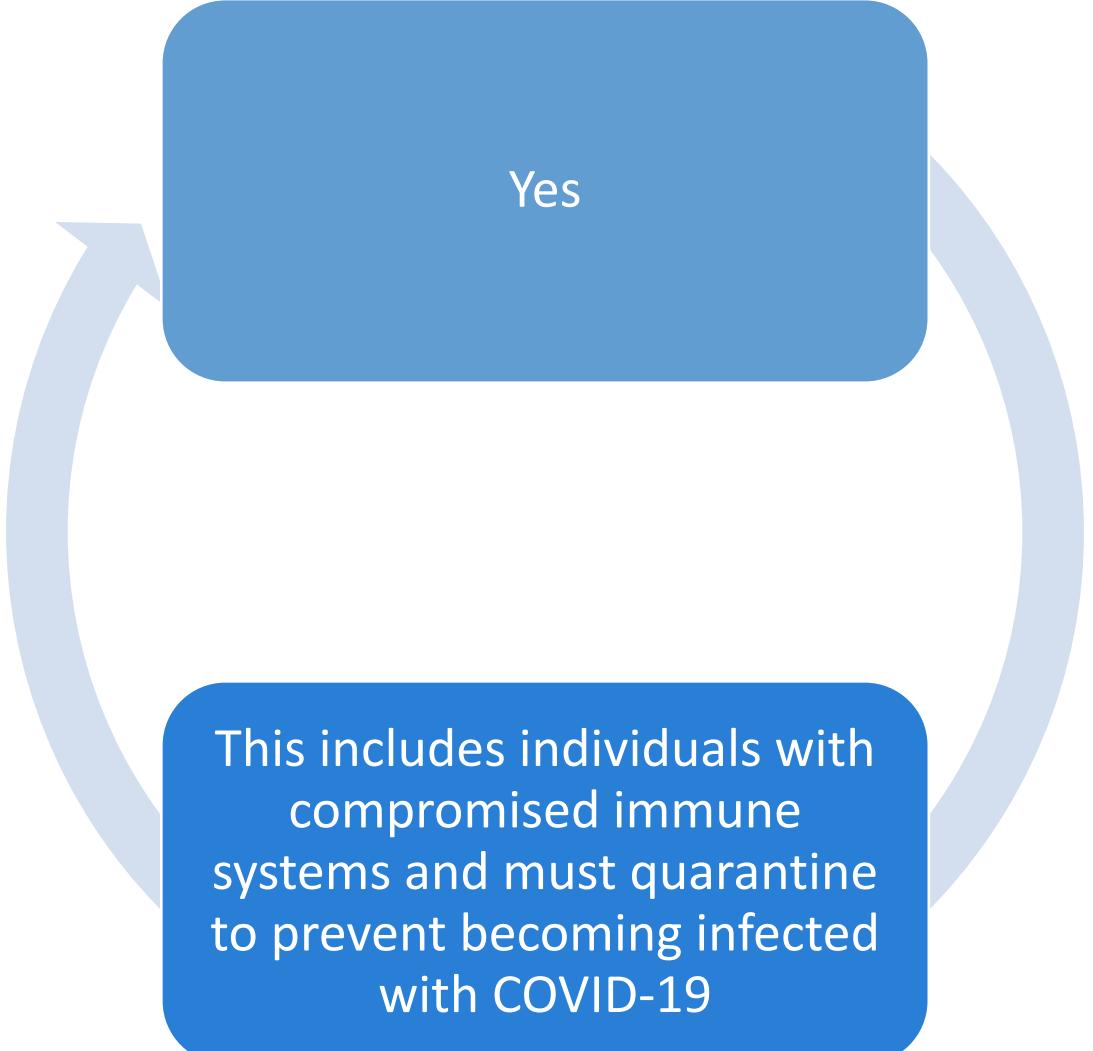


Would medical expenses of an employee who contracted COVID be a reimbursable expense if your city is self-insured?

Costs incurred by the local government through the self-insured risk pool for testing and treatment of COVID-19 for any covered beneficiary would be eligible for reimbursement as these costs were not contemplated in the determination of premiums for the current fiscal year.

Treasury guidance also provides for the use of CRF for workers' compensation coverage for first responders and critical health care workers who contract COVID-19.

What about the paid sick leave required by the federal legislation for those requiring quarantine because of exposure? Or those taking EFMLA due to FRCRA?



Yes

This includes individuals with compromised immune systems and must quarantine to prevent becoming infected with COVID-19

Is the City Manager's salary a qualified reimbursable expense if their daily activities were "substantially dedicated" to COVID-19 response?"

- ✓ Yes, but localities must be able to document use of their time and the activities that would qualify them as substantially dedicated.

Are recipients permitted to use Fund payments to pay for unemployment insurance costs incurred by the recipient as an employer?

Yes, Fund payments may be used for unemployment insurance costs incurred by the recipient as an employer (for example, as a reimbursing employer) related to the COVID-19 public health emergency if such costs will not be reimbursed by the federal government pursuant to the CARES Act or otherwise.

The Guidance includes workforce bonuses as an example of ineligible expenses but provides that hazard pay would be eligible if otherwise determined to be a necessary expense. Is there a specific definition of “hazard pay”?

Hazard pay means additional pay for performing hazardous duty or work involving physical hardship, in each case that is related to COVID-19. City should have a Hazard Pay Policy in-place.



May payments from the Fund be used to cover across-the-board hazard pay for employees working during a state of emergency?

❖NO

The Guidance says that funding may be used to meet payroll expenses for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency.



Personal Protective Equipment & Safety Measures

Can we request reimbursement for an increase in cleaning, disinfecting material and supplies used by the vendor under contract for operating our water and gas departments?



❖ No

The additional cost of supplies and materials are part of the city's normal operating cost.





Will sanitizing products and PPE that we purchased for COVID-19 be covered under CARES or will it be considered by FEMA / GEMA?

These are presumably FEMA Eligible expenditures, but may be covered by either, but not both. It is up to the local government to choose which to use. It should be noted that CARES fund CAN be used to make up the portion that FEMA does not cover and is considered the local contribution.

We have a small City Hall which we rent out, we need a lockable storage cabinet to store our COVID-19 PPE's and disinfectant chemicals. Can we use CARES Funding to buy that cabinet to keep them safe?

✓ Yes

COVID-19 related expenses that were unbudgeted will be allowed.





Can CARES Fund Payments be used for COVID-19 Public Health Emergency Recovery Planning?

✓ Yes

Expenses associated with conducting a recovery planning project or operating a recovery coordination office would be eligible, if the expenses otherwise meet the criteria set forth in section 601(d) of the Social Security Act outlined in the Guidance.

Are costs associated with increased solid waste capacity an eligible use of payments from the Fund?

- ✓ Yes, costs to address an increase in solid waste as a result of the public health emergency, such as relates to the disposal of used personal protective equipment, would be an eligible expenditure.

Since people have been at home for the last few months, they have been cleaning out and generating more trash than normal. This has led to an increased disposal cost for us. Would this be considered a reimbursable expense?

❖ **No**

Additional sanitation costs are not reimbursable unless directly related to COVID-19 response, i.e. disposal of PPE for medical or care facilities.

May Fund payments be used for expenditures necessary to prepare for a future COVID-19 outbreak?

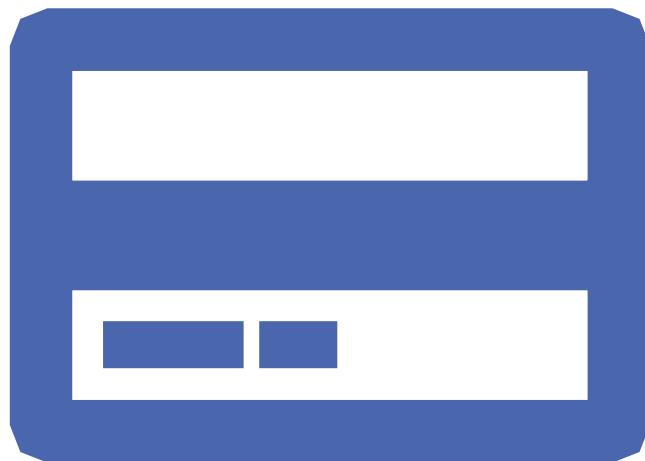
- ✓ Yes, fund payments may be used only for expenditures necessary to address the current COVID-19 public health emergency. For example, a City may spend Fund payments to create a reserve of personal protective equipment to support regions in its jurisdiction not yet affected, but likely to be impacted by the current COVID-19 pandemic.





Can cities purchase PPE & sanitation supplies and provide them to the schools (e.g. masks, hand sanitizer, Clorox wipes, thermometers, etc.)

✓ Yes, local entities can transfer this to another local entity (i.e. Local Education Agencies) for eligible expenses, which would include costs of PPE or increased sanitization for public health needs.



Is cost related to implementing online payments reimbursable?

- ✓ Yes, costs associated with shifting service delivery for citizens to an online format as part of local social distancing/public health measures would be eligible for reimbursement. **Ongoing** costs to maintain a virtual service delivery model **would not be eligible**.



Will the expense of sanitation & deep cleaning eligible?

- ✓ Yes, so long as it is sanitation efforts are above normal budgeted expenditures.



Teleworking

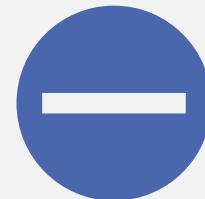


With more remote teleworking options being utilized, can cities use the funding to purchase laptops & hotspots for employees that need them?

- 
- ✓ Yes, so long as it is for the purpose of social distancing as a public health initiative and is not replacing existing resources but enabling teleworking for employees who would not otherwise have had equipment to do so.



Can a City be reimbursed
for full-time pay
provided to employees
who were sent home
after March 1, 2020?



No



The state has not authorized the use of CRF funds for payroll costs associated with administrative leave as those employees were previously budgeted. Additionally, Treasury guidance does not allow for payroll costs for employees performing their same duties but from a different location, i.e. teleworking.



Due to telework, would additional IT infrastructure and security for IT be an allowable expense? What about upgraded software?

✓ YES



Often there is a fee with software companies to allow for use of the software at home where employees can remote into the system (or an added user fee). Is that an eligible expense to allow work from home?

- ✓ Yes, but only for fees for services during the eligibility dates March 1, 2020 – September 1, 2020



Transfer of Funds

May a unit of local government that received CARES funds transfer funds to another unit of government?

- ✓ Yes, for example, a county may transfer funds to a city, town, or school district within the county and a county or city may transfer funds to its State, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other criteria of section 601(d) of the Social Security Act outlined in the Guidance.



May Fund payments be provided to non-profits for distribution to individuals in need of financial assistance, such as rent relief and what is their deadline to expend funds?

✓ Yes

Non-profits may be used to distribute assistance. Regardless of how the assistance is structured, the financial assistance provided would have to be related to COVID-19. The not-for-profit has until December 30, 2020 to expend all funds.





To what extent may a government use Fund payments to support the operations of private hospitals?

Governments may use Fund payments to support public or private hospitals to the extent that the costs are necessary expenditures incurred due to the COVID-19 public health emergency, but the form such assistance would take may differ. Financial assistance to private hospitals could take the form of a grant or a short-term loan.

May payments from the Fund be used to assist individuals with enrolling in a government benefit program for those who have been laid off due to COVID-19 and thereby lost health insurance?

✓ Yes

To the extent that the relevant government official determines that these expenses are necessary, and they meet the other requirements set forth in section 601(d) of the Social Security Act outlined in the Guidance, these expenses are eligible.

Would providing a consumer grant program to prevent eviction and assist in preventing homelessness be considered an eligible expense?

- ✓ Yes, if the recipient considers the grants to be a necessary expense incurred due to the COVID-19 public health emergency and the grants meet the other requirements for the use of Fund payments under section 601(d) of the Social Security Act outlined in the Guidance. As a general matter, aiding recipients to enable them to **meet property tax requirements** would **not be an eligible use of funds**, but exceptions may be made in the case of assistance designed to prevent foreclosures.



May recipients use Fund payments to provide emergency financial assistance to individuals and families directly impacted by a loss of income due to the COVID-19 public health emergency?

-
- ✓ Yes, if a government determines such assistance to be a necessary expenditure. Such assistance could include, for example, a program to assist individuals with payment of overdue rent or mortgage payments to avoid eviction or foreclosure or unforeseen financial costs for funerals and other emergency individual needs. Such assistance should be structured in a manner to ensure as much as possible, within the realm of what is administratively feasible, that such assistance is necessary.

The Guidance provides that eligible expenditures may include expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures. What is meant by a “small business,” and is the Guidance intended to refer only to expenditures to cover administrative expenses of such a grant program?

Governments have discretion to determine what payments are necessary. A program that is aimed at assisting small businesses with the costs of business interruption caused by required closures should be tailored to assist those businesses in need of such assistance. The amount of a grant to a small business to reimburse the costs of business interruption caused by required closures would also be an eligible expenditure under section 601(d) of the Social Security Act, as outlined in the Guidance.



Is a “Stay-at-Home Order Required to Help Small Businesses”?

- ❖ No, fund payments may be used for economic support in the absence of a stay-at-home order if such expenditures are determined by the government to be necessary. This may include, for example, a grant program to benefit small businesses that close voluntarily to promote social distancing measures or that are affected by decreased customer demand as a result of the COVID-19 public health emergency.





May fund payments be used to replace foregone utility fees? If not, can Fund payments be used as a direct subsidy payment to all utility account holders?



Fund payments may not be used for government revenue replacement, including the replacement of unpaid utility fees. Fund payments may be used for subsidy payments to electricity account holders to the extent that the subsidy payments are deemed by the recipient to be necessary expenditures incurred due to the COVID-19 public health emergency and meet the other criteria of section 601(d) of the Social Security Act outlined in the Guidance. For example, if determined to be a necessary expenditure, a government could provide grants to individuals facing economic hardship to allow them to pay their utility fees and thereby continue to receive essential services.

May recipients use Fund payments to provide loans?



- ✓ Yes, if the loans otherwise qualify as eligible expenditures under section 601(d) of the Social Security Act as implemented by the Guidance. Any amounts repaid by the borrower before December 30, 2020, must be either returned to Treasury upon receipt by the unit of government providing the loan or used for another expense that qualifies as an eligible expenditure under section 601(d) of the Social Security Act. Any amounts not repaid by the borrower until after December 30, 2020, must be returned to Treasury upon receipt by the unit of government lending the funds.

Can a city reimburse faith religious organizations?

- ✓ Yes, organizations providing goods or services in response to COVID-19 that are eligible for reimbursement under U.S. Treasury guidelines can be reimbursed regardless of the type of organization.

CRF may NOT be used for revenue offset.





Administrative Costs & Misc. Items

There is a product where the public can text governments regarding work requests, concerns, complaints, upload pictures and link numbers via text directly to the city. The purpose is to decrease public traffic in buildings and to encourage assistance through technology. Would this software be eligible under CARES?

✓ Yes

This would appear to be an expense related to the city's COVID-19 response and would be eligible. The period it would cover is March 1 thru December 31.



If we install cameras/computers at the front door of municipal buildings to capture public temperatures, is that an eligible expense?

✓ YES



Are Attorney Fees Covered?

CRF may not be used for revenue replacement if the city is seeking to use those funds for other non-COVID purposes that the attorney fees would have otherwise been used for. If the **expense** itself is **COVID related**, it is **reimbursable** regardless of the original source of cash used to make the payment.



May funds be used to satisfy non-federal matching requirements under the Stafford Act?

✓ Yes

Payments from the Fund may be used to meet the non-federal matching requirements for Stafford Act assistance to the extent such matching requirements entail COVID-19-related costs that otherwise satisfy the Fund's eligibility criteria and the Stafford Act. Regardless of the use of Fund payments for such purposes, FEMA funding is still dependent on FEMA's determination of eligibility under the Stafford Act.

Are Single Audit Fees Covered?

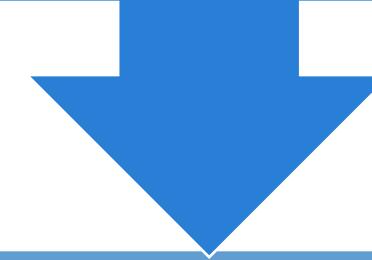
- ✓ Yes, such expenses would be eligible expenditures, subject to the limitations set forth in 2 C.F.R. § 200.425.





Can Funds be Used to Purchase Vehicles & Equipment?

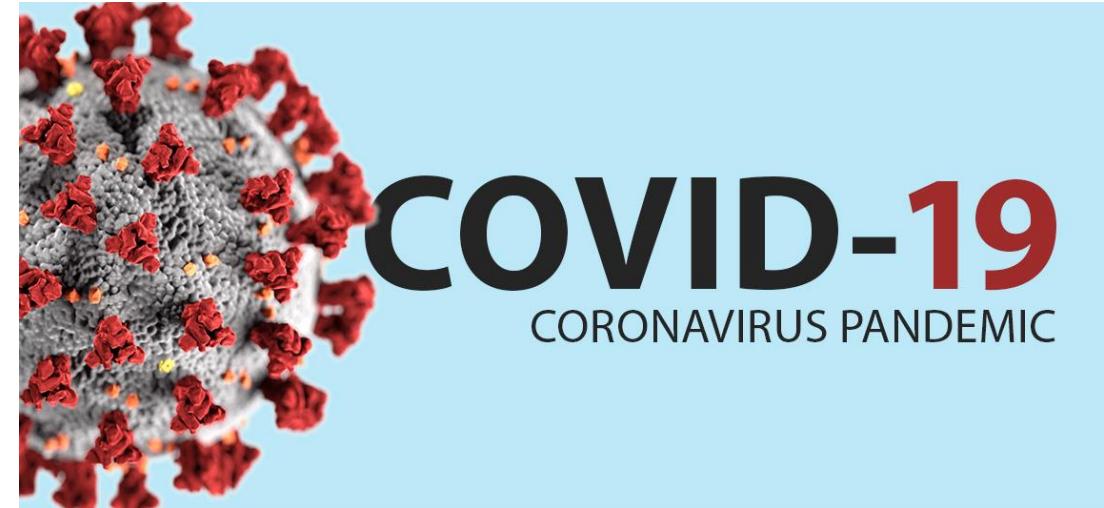
Yes, Vehicles & Equipment purchased to mitigate the risk of employees spreading or contracting COVID-19 and to abide by local social distancing requirements is a valid expense.



However, any good and service must be received by September 1st to be eligible for reimbursement from the first phase of funding.

The Key to Purchasing Assets with CARES Funds

The City MUST be able to document the need and demonstrate how it deals with COVID-19 issues. What COVID-19 issue are you addressing by purchasing this asset?



Are interior upgrades to City Hall to allow for social distancing of workers and citizens an eligible expense?

✓ Yes



We have kids and ball teams that use our park, can we use the money to build a men and ladies bathroom, so people can wash their hands while they are at the park?



Would cities with an independent school system be able to use a portion the City's CARES ACT funding allocation for COVID expenses related to school closings?

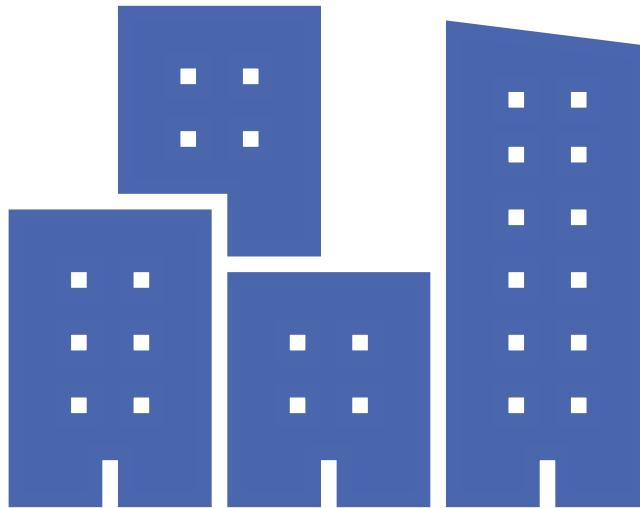
- ✓ Yes, if those expenses are directly related to the cost of transitioning to distance/virtual learning as a public health measure to facilitate social distancing.





May recipients use Fund payments to remarket the recipient's convention facilities and tourism industry?

- ✓ Yes, if the costs of such remarketing satisfy the requirements of the CARES Act. Expenses incurred to publicize the resumption of activities and steps taken to ensure a safe experience may be needed due to the public health emergency. Expenses related to developing a long-term plan to reposition a recipient's convention and tourism industry and infrastructure would not be incurred due to the public health emergency and therefore may not be covered using payments from the Fund.



Can a City spend CARES funds to retrofit their city facilities to install plexiglass & put up walls to have separate locations for customers coming into city hall to adhere to social distancing guidelines?

✓ YES

Can funds be used to purchase an ambulance to transport COVID patients that was not otherwise budgeted?

- ✓ Yes, however, any goods or service must be received by September 1st to be eligible for reimbursement from the first phase of funding.





Accounting of CARES Funds

Things to Consider

Fiscal Year
End

Chart of
Accounts

Professional
Judgement

Fiscal Year End



Fiscal Year End will have to be considered you account for the CARES Fund Revenue & Expenditures.



This is especially important if your fiscal year ends June 30th or anytime within the March 1 – September 1 Phase I funding period



Timing is critical: When did expenditure become eligible and when were CARES funds received



Consult with you auditor if you are unsure



Your Fiscal Year Matters

- For those cities with a fiscal year end of June 30 or anytime other than December 31, you must do your due diligence to ensure CARES expenditures and revenue are accounted for in the proper fiscal period.
- If you are unsure, talk with your auditors prior to posting.
- Make notes on why you made the decisions that you did regarding eligible expenditures and posting periods. The auditors may question how you made these determinations.
- Be SURE to have proper documentation for all Journal Entries.



For Accounting Questions on
How to Report CARES Funds
Contact:

Sherri D. Bailey
GMA Member Services Consultant
sbailey@gacities.com
470-755-1357



Questions

1. Do governments have to return unspent funds to Treasury?

Yes. Section 601(f)(2) of the Social Security Act, as added by section 5001(a) of the CARES Act, provides for recoupment by the Department of the Treasury of amounts received from the Fund that have not been used in a manner consistent with section 601(d) of the Social Security Act.

2. What records must be kept by governments receiving payment?

A government should keep records sufficient to demonstrate that the amount of Fund payments to the government has been used in accordance with section 601(d) of the Social Security Act.

3. May recipients deposit Fund payments into interest bearing accounts?

Yes, provided that if recipients separately invest amounts received from the Fund, they must use the interest earned or other proceeds of these investments only to cover expenditures incurred in accordance with section 601(d) of the Social Security Act and the Guidance on eligible expenses. If a government deposits Fund payments in a government's general account, it may use those funds to meet immediate cash management needs provided that the full amount of the payment is used to cover necessary expenditures. Fund payments are not subject to the Cash Management Improvement Act of 1990, as amended.

Questions



4. May governments retain assets purchased with payments from the Fund?

Yes, if the purchase of the asset was consistent with the limitations on the eligible use of funds provided by section 601(d) of the Social Security Act.

5. What rules apply to the proceeds of disposition or sale of assets acquired using payments from the Fund?

If such assets are disposed of prior to December 30, 2020, the proceeds would be subject to the restrictions on the eligible use of payments from the Fund provided by section 601(d) of the Social Security Act.

Advice from the Pros

Corinne B. Thornton

Office Director, Regional Community Services
Georgia Department of Community Affairs

Corinne.thornton@dca.ga.gov

Anna Miller

State Office of Planning & Budget

anna.miller@opb.georgia.gov



DCA REGIONAL SUPPORT

You are encouraged to work with your Department of Community Affairs Regional contact to get answers to your questions as well.

Region 1

Patrick Vickers

region1@dca.ga.gov

Region 2

Kathy Papa

region2@dca.ga.gov

Region 3

John VanBrunt IV

region3@dca.ga.gov

Region 4

Corrine Thornton

region4@dca.ga.gov

Region 5

Beth Eavenson

region5@dca.ga.gov

Region 6

Tonya Mole

region6@dca.ga.gov

Region 7

Tina Hutcheson

region7@dca.ga.gov

Region 8

Casey Beane

region8@dca.ga.gov

Region 9

Lynn Ashcraft

region9@dca.ga.gov

Region 10

Gina Webb

region10@dca.ga.gov

Region 11

Kelly Lane

region11@dca.ga.gov

Region 12

Jennifer Fordham

region12@dca.ga.gov



Resources

- State Office of Planning & Budgeting (OPB) <https://opb.georgia.gov/CARESact>
- GMA's Coronavirus Relief Funding Information <https://www.gacities.com/Resources/Reference-Articles/Coronavirus-Relief-Funding-Information.aspx>
- Electronic Code of Federal Regulations: Title 2 Part 200(Management & Budgeting for Federal Grants) <https://www.ecfr.gov/cgi-bin/text-idx?SID=d5030d74930faf9dc0f399f7d07e5fea&mc=true&tpl=/ecfrbrowse/Title02/2chapterII.tpl>
- Uniform Chart of Accounts (UCOA) <https://www.dca.ga.gov/local-government-assistance/research-surveys/uniform-chart-accounts-ucoa>

Thank You



Stan Brown: Districts 1 & 2
 (470) 553-5248
sbrown@gacities.com



Artiffany Stanley: Districts 6 & 9
 (404) 783-4736
astanley@gacities.com



Freddie Broome: District 3
 (404) 249-6423
fbroome@gacities.com



Emily Davenport: Districts 10 & 11
 (404) 852-1638
edavenport@gacities.com



Terrell Jacobs: Districts 4 & 8
 (404) 295-6247
tjacobs@gacities.com



Pam Helton: District 12
 (678) 686-6275
phelton@gacities.com



Sherri Bailey: Districts 5 & 7
 (470) 755-1357
sbailey@gacities.com

GMA Member Services Consulting Staff Service Areas

